

EXHIBIT A

PROPOSED SCHEDULE

1. Fed. R. Civ. P. 26 disclosures are to be exchanged within one week of answering or otherwise filing initial motions.
2. By **September 21, 2023**, Plaintiff shall serve its initial infringement contentions.
3. By **October 13, 2023**, the parties shall exchange a list of claim terms, phrases or clauses the party contends should be construed by the Court, together with proposed constructions for each. The parties shall thereafter meet and confer for the purposes of finalizing this list, narrowing the list, if possible, and/or resolving differences, if possible. The parties will also meet and confer regarding a procedure and schedule for claim construction, including whether claim construction should be addressed in the context of a summary judgment motion.
4. By **October 20, 2023**, Defendants shall serve their initial invalidity contentions.
5. By **October 27, 2023**, the parties shall file a joint claim construction statement identifying terms in dispute, proposed constructions, and agreed-upon constructions, if any, and a proposed procedure and schedule for claim construction.
6. The Court will thereafter convene a conference to address scheduling and protocol for claim construction.
7. All fact discovery shall be completed by sixty (60) days after a *Markman* ruling.
8. The parties shall serve final infringement and invalidity contentions within thirty (30) days of the *Markman* order.
9. All expert reports on behalf of the party having the burden of proof on the issue shall be served within seventy-five (75) days after the date of a *Markman* ruling by the Court.
10. All rebuttal expert reports, shall be served within thirty (30) days of receiving burden bearing reports.
11. All expert discovery shall be completed within thirty (30) days of service of rebuttal reports.
12. Summary judgment motions may be filed no later than thirty (30) days after the close of expert discovery.
13. A final pre-trial conference shall be held on a date to be determined by the Court at its discretion after determination of any summary judgment motions.
14. A trial shall be held at a date to be determined by the Court as soon as possible after determination of any summary judgment motions.